

Exhibit 2. Page 468 from DSM IV-TR

**Diagnostic criteria for
309.83 Posttraumatic Stress Disorder (continued)**

B. The traumatic event is persistently reexperienced in one (or more) of the following ways:

- (1) recurrent and intrusive distressing recollections of the event, including images, thoughts, or perceptions. **Note:** In young children, repetitive play may occur in which themes or aspects of the trauma are expressed.
- (2) recurrent distressing dreams of the event. **Note:** In children, there may be frightening dreams without recognizable content.
- ✓(3) acting or feeling as if the traumatic event were recurring (includes a sense of reliving the experience, illusions, hallucinations, and dissociative flashback episodes, including those that occur on awakening or when intoxicated). **Note:** In young children, trauma-specific reenactment may occur.
- (4) intense psychological distress at exposure to internal or external cues that symbolize or resemble an aspect of the traumatic event
- (5) physiological reactivity on exposure to internal or external cues that symbolize or resemble an aspect of the traumatic event

C. Persistent avoidance of stimuli associated with the trauma and numbing of general responsiveness (not present before the trauma), as indicated by three (or more) of the following:

- (1) efforts to avoid thoughts, feelings, or conversations associated with the trauma
- (2) efforts to avoid activities, places, or people that arouse recollections of the trauma
- (3) inability to recall an important aspect of the trauma
- (4) markedly diminished interest or participation in significant activities
- (5) feeling of detachment or estrangement from others
- (6) restricted range of affect (e.g., unable to have loving feelings)
- (7) sense of a foreshortened future (e.g., does not expect to have a career, marriage, children, or a normal life span)

D. Persistent symptoms of increased arousal (not present before the trauma), as indicated by two (or more) of the following:

- (1) difficulty falling or staying asleep
- ✓(2) irritability or outbursts of anger
- ✓(3) difficulty concentrating
- (4) hypervigilance
- (5) exaggerated startle response

E. Duration of the disturbance (symptoms in Criteria B, C, and D) is more than 1 month.

F. The disturbance causes clinically significant distress or impairment in social, occupational, or other important areas of functioning.

Specify if:

Acute: if duration of symptoms is less than 3 months

Chronic: if duration of symptoms is 3 months or more

Specify if:

With Delayed Onset: if onset of symptoms is at least 6 months after the stressor

Exhibits 3-14: Excerpts from May 5,2006 Deposition of Terri Pechner-James.

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS

3 TERRI PECHNER-JAMES
4 and SONIA FERNANDEZ,
Plaintiffs

5 VS. VOLUME IV
C.A. NO. 03-12499-MLW

6 CITY OF REVERE; THOMAS
7 AMBROSINO, MAYOR; CITY OF
8 REVERE POLICE DEPARTMENT,
9 TERRENCE REARDON, CHIEF;
10 BERNARD FOSTER, SALVATORE
SANTORO, ROY COLANNINO,
FREDERICK ROLAND, THOMAS DOHERTY,
JOHN NELSON, JAMES RUSSO,
MICHAEL MURPHY, and STEVEN FORD,
Defendants

11
12
13
14 CONTINUED DEPOSITION of TERRI

15 PECHNER-JAMES taken at the request of the
16 defendants pursuant to Rule 30 of the Federal
17 Rules of Civil Procedure before Nancy A.
Diemdowicz, Registered Merit Reporter, a
19 notary public in and for the Commonwealth of
20 Massachusetts, on May 5, 2006, commencing at
21 10:15 A.M. at the offices of Reardon, Joyce &
22 Akerson, 397 Grove Street, Worcest
23 Massachusetts.
24

COPY

A P P E A R A N C E S :

FOR THE PLAINTIFFS:

JAMES S. DILDAY, ESQ.
GRAY & DILDAY LLP
27 School Street
Boston, Massachusetts 02108

FOR THE DEFENDANTS. CITY OF REVERE: THOMAS
AMBROSINO, MAYOR: CITY OF REVERE POLICE
DEPARTMENT. TERRENCE REARDON, CHIEF:

WALTER PORR, ESQ.
PAUL CAPIZZI, ESQ.
Office of the City Solicitor
City Hall, 281 Broadway
Revere, Massachusetts 01251

FOR THE DEFENDANTS, BERNARD FOSTER. SALVATORE
SANTORO. ROY COLANNINO. FREDERICK ROLAND.
THOMAS DOHERTY. JOHN NELSON, JAMES RUSSO.
MICHAEL MURPHY AND STEVEN FORD:

MICHAEL AKERSON, ESQ.
REARDON, JOYCE & AKERSON, P. C.
397 Grove Street
Worcester, Massachusetts 01605

QUESTIONS WITNESS REFUSED TO ANSWER

Page 663 - Lines 2 - 4

Page 664 - Lines 14-15

Page 664 - Lines 22-23

Page 678 - Lines 7-10

Page 678 - Lines 20-22

Page 679 - Lines 3-5

Page 681 - Lines 7-9

Page 721 - Lines 7-9

Page 721 - Lines 14-15

Page 730 - Lines 5-9

Page 744 - Lines 4-5

I N D E X

DEPONENT: TERRI PECHNER-JAMES

PAGE

EXAMINATION BY MR. PORR

554

EXHIBITS

PAGE

8. 1996 Calendar

594

9. Memorandum dated 1/14/99

597

10. Photocopy of Photograph

617

11. Affidavit of Compliance, MCAD

652'

12. 1997 Calendar

744

13. Answers to Interrogatories

756

1 school with him.

2 Q. All right. How long before you got
3 pregnant with Kenisha had you met Mr. Todd?
4 How long had you known him?

5 A. None of your business. How do you
6 like that for an answer?

7 Q. Well, I'd prefer a factual answer
8 that's responsive to the question. Are you
9 refusing to answer?

10 A. I'm refusing to answer.

11 MR. PORR: Madam reporter, would
12 you please mark the record.

13 Q. Is Mr. Todd on Kenisha's birth
14 certificate?

15 A. Yes, he is.

16 Q. Okay. Has he provided child
17 support for her?

18 A. Sometimes.

19 Q. Were you and he ever married?

20 A. No.

21 Q. How old was Mr. Todd when Kenisha
22 was born? Was he your age? A little older?
23 A little younger?

24 A. I don't know.

1 Q. Okay. If my math holds out, you
2 got pregnant, then, sometime in February of
3 '89 with Kenisha?

4 A. That's good math.

5 Q. Okay. So you were 15 years old at
6 the time you got pregnant?

7 A. Sure.

8 Q. All right. Were you living at home
9 at the time?

10 A. Yes, I was.

11 Q. Okay. Were you able to stay in
12 school after you got pregnant?

13 A. Sure.

14 Q. How soon after you met Mr. Todd did
15 you and he engage in sexual intercourse?

16 A. I already told you I'm not
17 answering that question.

18 MR. PORR: Madam reporter, would
19 you mark the record.

20 A. It has nothing to do with this
21 case.

22 Q. Was Mr. Todd the first individual
23 that you had intercourse with?

24 MR. DILDAY: Objection to that one.

1 MR. PORR: Objection is noted,
2 counsel.

3 A. I'm refusing to answer it.

4 MR. PORR: Madam reporter, would
5 you mark the record.

6 Q. Did you and Mr. Todd continue in a
7 relationship after Kenisha was born?

8 A. No.

9 Q. Okay. Did you ever live with his
10 family?

11 A. No.

12 Q. Did he ever live with your family?

13 A. No.

14 Q. Did you and Mr. Todd and Kenisha
15 ever live together as a family unit?

16 A. No.

17 Q. Your middle child, it's a boy,
18 right?

19 A. Correct.

20 Q. And it's the boy that's in the
21 photograph marked as Exhibit 10?

22 A. Yup.

23 Q. Okay. What is his name?

24 A. Who's that? My son?

1 A. I don't remember.

2 Q. Okay. When you dated, did you tend
3 to date one person exclusively, or would you
4 date a number of different people at the same
5 time?

6 A. Can you ask that question again?

7 Q. Sure. When you dated, did you tend
8 to date one person exclusively, or would you
9 date a number of different men at the same
10 time?

11 MR. DILDAY: And I'm going to tell
12 her - -

13 A. Would you ask Brian that? Because
14 Brian was actually cheating on his girlfriend.

15 MR. DILDAY: I'm going to tell her"
16 not to answer to that because it's totally
17 irrelevant.

18 MR. PORR: Madam reporter, would
19 you mark the record.

20 Q. In your dating relationship with
21 Brian Goodwin, did you and he ever engage in
22 sexual intercourse?

23 MR. DILDAY: Again, she doesn't
24 have to answer. It's irrelevant.

1 MR. PORR: Madam reporter, would
2 you mark the record.

3 Q. In your dating with Ray Thompson,
4 did you and he ever engage in sexual
5 intercourse?

6 MR. DILDAY: Again, advising her
7 not to answer.

8 Q. Ms. Pechner, are you going to
9 follow your counsel's advice and not answer
10 those questions?

11 A. Yes, ■ am.

12 MR. PORR: Madam reporter, would
13 you mark the record.

14 A. Because now all you want to know is
15 my sex -- ■ went through this with the police
16 department. You're supposed to be
17 representing the mayor and the chief. What my
18 sexual preference and my sexual -- who ■ had
19 sex with has nothing to do with you. It's
20 none of your business. It's none of this
21 case's business. Because ■ was sexually
22 harassed on the job instead of doing an
23 investigation as to why ■ was sexually
24 harassed -- not only sexually harassed but

1 and he live together?

2 A. I don't remember.

3 Q. You don't remember?

4 A. No.

5 Q. How can you not remember that?

6 A. Don't remember.

7 Q. Prior to getting married on May 11
8 of 2001, did you and he engage in sexual
9 intercourse?

10 A. I'm not answering that question.

11 MR. PORR: Madam reporter, would
12 you mark the record.

13 Q. Did you date any other police
14 officers of the Revere Police Department aside
15 from Mark James and Brian Goodwin?

16 A. No.

17 Q. Did Mark James date any of the
18 female officers on the Revere Police
19 Department?

20 A. No.

21 Q. Was Mark James married prior to his
22 marriage to you?

23 A. No.

24 Q. Did he have any children. from

1 Q. Okay. All right. I think that's
2 all for that exhibit. Before I move on to, if
3 you will, 1997, as you can gather, I'm trying
4 to move in a chronological fashion. We talked
5 earlier about your children. We got a few
6 details about that.

7 Have you had any other pregnancies
8 other than the ones that resulted in the birth
9 of your three children?

10 A. I'm going to refuse to answer that
11 question.

12 MR. PORR: Okay. Would you mark
13 the record, please.

14 Q. How many other such pregnancies did
15 you have?

16 A. No one said I had any, but I don't
17 think it's relevant to the case, so I'm going
18 to refuse to answer any --

19 MR. PORR: Would you mark the
20 record, please.

21 Q. From October -- I'm sorry --
22 September of '95, when you were sworn in as a
23 police officer, until March 13 of 2001, when
24 you walked off the job, were you pregnant

1 intentionally try to keep your relationship a
2 secret?

3 A. Again, it's not anybody's business
4 who ■ date.

5 Q. Okay. ■ understand that,
6 Ms. Pechner. My question is, Did you and
7 Officer James intentionally, deliberately,
8 purposely attempt to keep your relationship a
9 secret?

10 A. Maybe.

11 Q. ■ mean, did you or didn't you?

12 A. Maybe.

13 MR. PORR: Mark the record.

14 Q. All right. So if ■ understand
15 correctly, there was the seniority issue
16 grievance from February '96 and there was
17 Officer Burns' behavior from August of '96.

18 During calendar 1996, did anything
19 else happen that is in any way related to this
20 case?

21 A. ■ don't recall.

22 Q. Okay. How were you feeling as a
23 Revere police officer as you completed your
24 first year on the job in 1996?

1 your notes, of 2001 attribute a different quote
2 to the chief, the complaint of 2003 attributes
3 the quote from the notes of 1999 to the chief.

4 My question to you, Which one is
5 accurate?

6 MR. DILDAY: Objection.

7 MR. PORR: Noted for the record,
8 counsel.

9 A. Asked and answered.

10 MR. PORR: Mark the record, please.
11 Would you mark this as the next in order.

12
13 (Deposition Exhibit No. 12 marked.)

14 Q. Let me hand you what I've had
15 marked as Exhibit 12 and ask you to review
16 that, please, and when you've finished, look
17 up.

18 A. (Looks at document.) All set.

19 Q. All right. The exhibit we've had
20 marked as number --

21 MR. DILDAY: 12.

22 Q. -- 12, thank you, you recognize
23 that as your calendar for calendar year 1997,
24 correct?